

1 **HEFNER, STARK & MAROIS, LLP**
2 Howard S. Nevins (CA Bar Assn. No. 119366)
3 Aaron A. Avery (CA Bar Assn. No. 245448)
4 2150 River Plaza Drive, Suite 450
5 Sacramento, CA 95833-3883
6 Telephone: (916) 925-6620
7 Fax No: (916) 925-1127
8 Email: aavery@hsmlaw.com

9 Proposed Attorneys for
10 GEOFFREY RICHARDS,
11 Chapter 7 Trustee

12 **UNITED STATES BANKRUPTCY COURT**
13 **EASTERN DISTRICT OF CALIFORNIA**
14 **(Sacramento Division)**

15 In re

16 **PATRICK L. SKAGGS AND**
17 **SHALEE G. SKAGGS,**
18 **Debtors.**

19 Case No.: 13-25727-D-7

20 DC No.: HSM-002

21 NO HEARING SET

22 **STIPULATION EXTENDING TIME TO FILE A COMPLAINT OBJECTING TO**
23 **DISCHARGE OF DEBTORS**

24 This stipulation (the "Stipulation") is hereby entered into by and between PATRICK L. SKAGGS and SHALEE G. SKAGGS (the "Debtors"), through their Counsel, Mohammad M. Mokarram, Esq., and GEOFFREY RICHARDS, the duly appointed Chapter 7 Trustee ("Trustee") in the Debtors' pending bankruptcy case, through the Trustee's proposed counsel, Aaron A. Avery, Esq., of Hefner, Stark & Marois, LLP. The deadline to file an a Complaint Objecting to Discharge of Debtors is presently set for July 29, 2013. The Trustee and the Debtors have agreed to extend the deadline for the Trustee to object to the Debtors' discharge until October 28, 2013.

25 1. Pursuant to Federal Rule of Bankruptcy Procedure 4004(b), the Court may, for cause, extend the time to file a complaint objecting to discharge.

26 2. Cause exists for the agreed upon extension in that the Trustee is presently investigating at least one transfer made by the Debtors which may be avoidable, as well as

1 the Debtors' assets, liabilities, and financial affairs. The circumstances of the potentially
2 avoidable transfer, and the Debtors' cooperation in the above matters, is important to the
3 Trustee's administration of this estate, and the Debtors' cooperation, or lack thereof, may be
4 a factor in the evaluation of any possible objection to discharge.

5 3. The parties agree that the deadline within which the Trustee may file a complaint
6 objecting to the Debtors' discharge shall be extended until October 28, 2013.

7 **IT IS SO AGREED:**

8 Dated: July 17, 2013

HEFNER, STARK & MAROIS, LLP

9 By

10 Aaron A. Avery, Proposed Attorneys for
11 GEOFFREY RICHARDS, Chapter 7 Trustee

12 By

13 Mohammad M. Mokarram, Attorneys for
14 PATRICK L. SKAGGS AND SHALEE G.
15 SKAGGS, Debtors

16 HEFNER, STARK & MAROIS, LLP
17 Sacramento, California

18 Dated: July 17, 2013

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